

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

SEARS HOLDING CORPORATION, *et al.*,<sup>1</sup>

Case No. 18-23538 (RDD)

Debtors.

(Jointly Administered)

**NOTICE OF WITHDRAWAL OF SUPPLEMENTAL CURE COSTS  
OBJECTION OF MANCO FLORIDA ASSOCIATES, LLC IN RESPONSE TO NOTICE  
OF ASSUMPTION AND ASSIGNMENT OF ADDITIONAL DESIGNATABLE LEASES**

COMES NOW, MANCO FLORIDA ASSOCIATES, LLC (“Landlord”), by and through the undersigned counsel and hereby gives notice of the withdrawal of Landlord’s Supplemental Cure Costs Objection of Manco Florida Associates, LLC in Response to Notice of Assumption and Assignment of Additional Designatable Leases (Doc. No. 3405).

Dated: May 29, 2019

/s/ Ryan C. Reinert

RYAN C. REINERT (*admitted pro hac vice*)

Florida Bar No. 81989

SHUTTS & BOWEN LLP

4301 W. Boy Scout Blvd., Suite 300

Tampa, Florida 33607

Telephone: (813) 229-8900

E-Mail: [reinert@shutts.com](mailto:reinert@shutts.com)

*Attorneys for Manco Florida Associates, LLC*

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing has been provided on May 29, 2019 via transmission of Notice of Electronic Filing generated by CM/ECF on all parties of record, and on parties on the attached Service List as indicated.

/s/ Ryan C. Reinert  
Attorney

**SERVICE LIST**

**VIA EMAIL**

I. Bid Notice Parties

a. Debtors

Rob Riecker: [rob.riecker@searshc.com](mailto:rob.riecker@searshc.com)

Luke Valentino: [luke.valentino@searshc.com](mailto:luke.valentino@searshc.com)

Mohsin Meghji: [mmeghji@miiipartners.com](mailto:mmeghji@miiipartners.com)

b. Debtors' counsel

Ray Schrock, Esq.: [ray.schrock@weil.com](mailto:ray.schrock@weil.com)

Jacqueline Marcus, Esq.: [jacqueline.marcus@weil.com](mailto:jacqueline.marcus@weil.com)

Garrett A. Fail, Esq.: [garrett.fail@weil.com](mailto:garrett.fail@weil.com)

Sunny Singh, Esq.: [sunny.singh@weil.com](mailto:sunny.singh@weil.com)

c. Debtors' investment banker:

Brandon Aebersold and Levi Quaintance: [project.blue.rx@lazard.com](mailto:project.blue.rx@lazard.com)

II. Buyer Parties

a. Buyer

Kunal S. Kamalani: [kunal@eslinvest.com](mailto:kunal@eslinvest.com)

Harold Talisman: [harold@eslinvest.com](mailto:harold@eslinvest.com)

b. Counsel

Christopher E. Austin, Esq.: [caustin@cgsh.com](mailto:caustin@cgsh.com)

Benet J. O'Reilly, Esq.: [boreilly@cgsh.com](mailto:boreilly@cgsh.com)

Sean A. O'Neal, Esq.: [soneal@cgsh.com](mailto:soneal@cgsh.com)

III. Consultation Parties

a. Bank of America

Paul Leake, Esq.: [Paul.Leake@skadden.com](mailto:Paul.Leake@skadden.com)

Shana Elberg, Esq.: [Shana.Elberg@skadden.com](mailto:Shana.Elberg@skadden.com)

George Howard, Esq.: [George.Howard@skadden.com](mailto:George.Howard@skadden.com)

b. Wells Fargo Bank

Kevin J. Simard, Esq.: [ksimard@choate.com](mailto:ksimard@choate.com)

Jonathan D. Marshall, Esq.: [jmarshall@choate.com](mailto:jmarshall@choate.com)

c. Committee

Ira S. Dizengoff, Esq. : [idizengoff@akingump.com](mailto:idizengoff@akingump.com)

Philip C. Dublin, Esq.: [pdublin@akingump.com](mailto:pdublin@akingump.com)

Abid Qureshi, Esq.: [aqureshi@akingump.com](mailto:aqureshi@akingump.com)

Sara L. Brauner, Esq.: [sbrauner@akingump.com](mailto:sbrauner@akingump.com)

**VIA FIRST CLASS MAIL**

Chambers of the Honorable Robert D. Drain  
U.S. Bankruptcy Court for the Southern District of New York  
300 Quarropas Street, Suite 248  
White Plains, NY 10601

Office of the United States Trustee for Region 2  
Attn: Paul Schwartzberg, Esq.  
201 Varick Street, Suite 1006  
New York, NY 10014

Transform Holdco, LLC  
c/o ESL Partners, Inc.  
Attn: Kunal S. Kamalani and Harold Talisman  
1170 Kane Concourse, Suite 200  
Bay Harbor Islands, FL 33154

Sears Holdings Corporation  
Attn: General Counsel  
3333 Beverly Road  
Hoffman Estates, IL 60179

Weil, Gotshal & Manges LLP  
Attn: Ray C. Schrock, P.C., Jacqueline Marcus, Esq., Garret A. Fail, Esq., Sunny  
Singh, Esq., Ellen J. Odoner, Esq., and Gavin Westerman, Esq.  
767 Fifth Avenue  
New York, New York 10153

Cleary Gottlieb Steen & Hamilton LLP  
Attn: Christopher E. Austin, Esq., Benet J. O'Reilly, Esq., and Sean A. O'Neal, Esq.  
One Liberty Plaza  
New York, NY 10006